code for outputting the locus image which is overlaid on the new text image reproduced from the edited text information, the locus image being shifted according to the calculated shift amount.

## **REMARKS**

This application has been carefully reviewed in light of the Office Action dated August 14, 2002 (Paper No. 18). Claims 1 to 31 are in the application, of which Claims 1, 10, 14, 26, 30 and 31 are independent. Reconsideration and further examination are respectfully requested.

Claims 1 to 31 were rejected under 35 U.S.C. § 103(a) over excerpts from a book entitled "MS Exchange Users Handbook" (Mosher) in view of U.S. Patent 5,590,257 (Forcier) and further in view of an IBM Technical Disclosure Bulletin entitled "Linking Handwriting Annotation with Text" (IBM). The rejections are respectfully traversed.

The invention concerns information processing in which images for text data and ink data are overlaid. When an edit or insertion is made to the text data, the position of its image is affected. Without a change in the position of the ink image, good relative positioning between images for the text and ink data cannot be maintained.

The present invention addresses the foregoing situation by calculating a shift amount for the reproduction position of the ink image (Claims 1, 14 and 30) or the locus image (Claims 10, 26 and 31). Thereafter, the ink image (or locus image) is output in a shifted position according to the calculated shift amount.

The applied art is not seen to disclosure or to suggest the foregoing arrangement, particularly as regards a calculation of a shift amount as well as an output of an ink image (or locus image) overlaid on a text image at a position shifted according to the calculated shift amount.

The Office Action specifically concedes that Mosher does not disclose or suggest the foregoing, and implicitly concedes the same with respect to Forcier. Rather, the Office Action relies on IBM as allegedly teaching the foregoing feature. Applicants respectfully disagree.

IBM discusses a handwriting annotation system in which a handwritten annotation is linked to text data. As described by IBM, this linking is accomplished by a "link marker" which is a special type of character. To make a link to handwritten annotations, the user inserts the link marker directly into the text. Thereafter, wherever the text is moved, the link marker automatically follows, and the position of the link marker becomes the basis for displaying the corresponding handwritten annotations.

Thus, unlike the invention, IBM does not calculate a shift amount for the output position of its handwritten annotations, nor does it output the handwritten annotations based on a calculated shift amount. Instead, because IBM outputs its handwritten annotation wherever the link marker appears, there is no need to calculate a shift amount, and this is not apparently done.

The Office Action took the position that lines 10 to 29 on IBM's page 1 shows moving text and handwritten annotations together by a predetermined shift amount. Applicants have studied the cited portion of IBM, but finds no such disclosure of a "predetermined shift amount". Instead, as explained above, IBM displays its handwritten

annotation in correspondence to the position where the link marker is displayed, wherever that might happen to be. This is emphasized by the description in IBM itself:

"Whenever the user moves or copies phrases or sentences that include the link marker to other locations, the corresponding annotations will follow the link marker. The position of the link marker becomes the basis for displaying handwritten annotations on the text (Fig. 2). The system searches for the link marker within the screen ..."

This explanation is reinforced by the appearance of IBM's Figure 2, which shows two link markers: a rightward-pointing finger and a downward-pointing finger. The link markers are embedded in text, as shown at the upper left hand side of Figure 2. The link markers are linked to handwritten annotations, as shown at the upper right hand side of Figure 2. Thereafter, wherever the link markers actually appear in the text, as shown in the bottom of Figure 2, the corresponding handwritten annotations are displayed.

Applicants therefore respectfully submit that the applied art does not show at least the feature of a calculation of shift amount for an ink image, as well as an outputting of an ink image at a position corresponding to the calculated shift amount.

Withdrawal of the § 103(a) rejection is therefore respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa,

California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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Atty. Docket No.: 03500.012943

## VERSION WITH MARKINGS TO SHOW CHANGES MADE TO CLAIMS

1. (Three Times Amended) An information processing method comprising:

storing a received mail document including text data and ink data, an ink image being reproduced from the ink data and overlaid on a text image reproduced from the text data when the mail document is reproduced, a reproduction position of the ink image being defined by a coordinate value on reference coordinate axes of the received mail document;

inserting a character string to [the] text data of a new document when a new document quoting the received mail document is prepared;

calculating [deriving] a shift amount of [an output] the reproduction position of the ink image according to a new text image reproduced from the text data to which the character string was inserted; and

outputting, as the new document, the ink image which is overlaid on the new text image reproduced from the text data to which the character string was inserted, the ink image being shifted according to the [derived] <u>calculated</u> shift amount.

7. (Amended) The information processing method according to Claim 1, wherein the [shift] new output document [of said received mail] is carried out by setting said shift amount as an offset value of said received mail document.

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8. (Amended) The information processing method according to Claim 1, wherein said shift amount is [derived] <u>calculated</u> according to a number of lines of the character string to be inserted and a line pitch of the document format.

9. (Amended) The information processing method according to Claim 1, wherein said shift amount is [derived] <u>calculated</u> according to a number of lines and a number of characters of the character string to be inserted and according to a line pitch and a character pitch of the document format.

10. (Three Times Amended) An information processing method comprising: storing document information comprising locus information and text information, a locus image being reproduced from the locus information and overlaid on a text image being reproduced from the text information when the document is reproduced, a reproduction position of the locus image being defined by a coordinate value on reference coordinate axes of the document information;

editing said text information;

calculating [deriving] a shift amount of [an output] the reproduction position of the locus image according to a new text image reproduced from the edited text information; and outputting the locus image which is overlaid on the new text image reproduced from the edited text information, the locus image being shifted according to the [derived] calculated shift amount.

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11. (Three Times Amended) The information processing method according to Claim 10, wherein the [derived] <u>calculated</u> shift amount is a difference between a position of the text image upon output thereof without the editing and a position of the text image upon output

thereof after the editing.

mail document;

14. (Three Times Amended) An information processing apparatus comprising: received mail storing means for storing a received mail document including text data and ink data, an ink image being reproduced from the ink data and overlaid on a text image reproduced from the text data when the mail document is reproduced, a reproduction position of the ink image being defined by a coordinate value on reference coordinate axes of the received

insertion means for inserting a character string to [the] text data of a new document when a new document quoting the received mail document is prepared;

shift amount [deriving] <u>calculating</u> means for [deriving] <u>calculating</u> a shift amount of [an output] <u>the reproduction</u> position of the ink image according to a new text image reproduced from the text data to which the character string was inserted; and

output means for outputting, as the new document, the ink image which is overlaid on the new text image reproduced from the text data to which the character string was inserted, the ink image being shifted according to the [derived] <u>calculated</u> shift amount.

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18. (Amended) The information processing apparatus according to Claim 14, [wherein.said] wherein said character string to be inserted is a character string that can be edited.

- 20. (Amended) The information processing apparatus according to Claim 14, wherein the [shift] new output document [of said received mail] is carried out by setting said shift amount as an offset value of said received mail document.
- 21. (Amended) The information processing apparatus according to Claim 14, wherein said shift amount is [derived] <u>calculated</u> according to a number of lines of the character string to be inserted and a line pitch of the document format.
- 22. (Amended) The information processing apparatus according to Claim 14, wherein said shift amount is [derived] <u>calculated</u> according to a number of lines and a number of characters of the character string to be inserted and according to a line pitch and a character pitch of the document format.
- 26. (Three Times Amended) An information processing apparatus comprising: storage means for storing document information comprising locus information and text information, a locus image being reproduced from the locus information and overlaid on a text image being reproduced from the text information when the document is reproduced, a

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reproduction position of the locus image being defined by a coordinate value on reference coordinate axes of the document information;

text edit means for editing said text information;

shift amount [deriving] <u>calculating</u> means for [deriving] <u>generating</u> a shift amount of [an output] <u>the reproduction</u> position of the locus image according to a new text image reproduced from the edited text information; and

output means for outputting the locus image which is overlaid on the new text image reproduced from the edited text information, the locus image being shifted according to the [derived] <u>calculated</u> shift amount.

27. (Three Times Amended) The information processing apparatus according to Claim 26, wherein the [derived] <u>calculated</u> shift amount is a difference between a position of the text image upon output thereof without the editing and a position of the text image upon output thereof after the editing.

30. (Three Times Amended) A storage medium for storing computer-executable process steps for an information processing method, said storage medium storing:

code for storing a received mail document including text data and ink data, an ink image being reproduced from the ink data and overlaid on a text image reproduced from the text data when the mail document is reproduced, a reproduction position of the ink image being defined by a coordinate value on reference coordinate axes of the received mail document;

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code for inserting a character string to [the] text data of a new document when a new document quoting the received mail document is prepared;

code for [deriving] <u>calculating</u> a deviation amount of [an output] <u>the reproduction</u> position of the ink image according to a new text image reproduced from the text data to which the character string was inserted; and

code for outputting, as the new document, the ink image which is overlaid on the new text image reproduced from the text data to which the character string was inserted, the ink image being shifted according to said [derived] <u>calculated</u> shift amount.

31. (Three Times Amended) A storage medium for storing computer-executable process steps for an information processing method, said storage medium storing:

code for storing document information comprising locus information and text information, a locus image being reproduced from the locus information and overlaid on a text image being reproduced from the text information when the document is reproduced, a reproduction position of the locus image being defined by a coordinate value on reference coordinate axes of the document information;

code for editing said text information;

code for [deriving] <u>calculating</u> a shift amount of [an output] <u>the reproduction</u> position of the locus image according to a new text image reproduced from the edited text information; and

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code for outputting the locus image which is overlaid on the new text image reproduced from the edited text information, the locus image being shifted according to the [derived] <u>calculated</u> shift amount.

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